

## REMARKS

Reconsideration of the application is respectfully requested.

All claims, namely claims 1, 3, and 5-14 stand rejected as being obvious in view of U.S. Patent No. 6,519,261 issued to Brueckheimer, et al. ("Brueckheimer '261"), U.S. Patent No. 6,683,877 issued to Gibbs, et al. ("Gibbs"), and U.S. Patent No. 6,665,300 issued to Caves, et al. ("Caves"). Applicant continues to disagree with the rejection, for the following reasons.

As an initial matter, Applicant respectfully finds that the rejection is somewhat difficult to ascertain. For example, on page 3, the Office Action states that Brueckheimer '261 does not "disclose expressly the following limitation, which is disclosed by Gibbs, as follows: 'mapping the common CID to virtual paths/ virtual channel (VP/VC), ... that forms part of a virtual user network interface to an ATM network'." In the next paragraph, however, the Office Action states that Brueckheimer '261 and Gibbs do not disclose expressly the following limitation, which is disclosed by Caves explicitly, as follows: "mapping the common CID to virtual paths/ virtual channel (VP/VC) ..." Thus, if it is the Examiner's position that Gibbs discloses *mapping the CIDs to a virtual path/virtual channel that forms part of a virtual UNI to an ATM network*, then why rely on Caves? Applicant, therefore, assumes for the purposes of this response, that neither Gibbs nor Brueckheimer '261 teach or suggest the limitation in claim 1 of *mapping the AAL2 CIDs to a virtual path/virtual channel that forms part of a virtual UNI to an ATM network*. Applicant respectfully disagrees that Caves discloses such a limitation.

In Caves, collisions caused by simultaneous allocation of the same CID to two AAL2 connections, over an ATM virtual channel connection between first and second nodes, are avoided by the use of status records. [Caves, Abstract] An AAL2 signaling function architecture is disclosed in Caves that is divided into three sets of procedures. Outgoing signaling procedures are invoked when a local call handling entity originates an AAL2 connection setup or release instruction. Incoming signaling procedures are similarly invoked when a distant pier call handling entity originates either AAL2 connection setup or release instructions. Finally, **status record procedures are invoked**

during AAL2 connection setup and release, to provide a record of the status of the individual AAL2 channels available for assignment on AAL2 VCC. The status record procedures are responsible for maintaining the status of a given set of AAL2 channels that have been allocated for use on one or more AAL2 VCCs. [Caves, col. 3, line 55 to col. 54, line 10] Accordingly, Caves focuses on the status of an AAL2 channel, not how to signal the channel.

Once a virtual channel connection (VCC) is available in Caves, it may be used by AAL2, to enable multiple calls to be transported on a single VCC via a multiplexing technique that places short packets of information within an ATM cell. Individual AAL2 calls on the same VCC are distinguished by their CID values. However, the allocation of CID values that may be assigned to AAL2 connections does not teach or suggest that *the CIDs be mapped to a virtual path/virtual channel (VP/VC) that forms part of a virtual UNI to an ATM network*. None of the references cited by the Examiner, including Brueckheimer '261, Gibbs, and Caves teaches or suggests a method in which AAL2 CIDs are established on a call-to-call basis using *ATM standards-based call control signaling protocols and mapping the CIDs to a virtual path/virtual channel (VP/VC) that forms part of a virtual UNI to an ATM network*.

In Caves, only a generic reference is made to a "AAL2 signaling function" without teaching or suggesting that an ATM standards-based call control signaling protocol be used together with the mapping of the CIDs to a virtual path/virtual channel that forms part of a virtual UNI to an ATM network. Note that the CID of a designated AAL2 virtual channel connection (VCC) as claimed is **further** mapped to the VP/VC of the virtual UNI. None of the relied upon references teach or suggest such a method for establishing an AAL2 switched voice network. This point has been clarified in the claim amendments here, without introducing any new matter. Accordingly it could not have been obvious to a person of ordinary skill in the art to modify any of the capabilities in Gibbs, Brueckheimer '261, or Caves with such a capability of mapping the CID of a designated AAL2 VCC to a VP/VC of a virtual UNI.

As to independent claims 3, 5, and 11, these are also not obvious for at least the reasons given above in support of claim 1.


If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

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By

  
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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail with sufficient postage in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, Post Office Box 1450, Alexandria, Virginia 22313-1450 on February 28, 2006.

  
Margaux Rodriguez

February 28, 2006